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Board of Vocational Nursing
and Psychiatric Technicians

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8 **BEFORE THE**
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. VN-2009-1088

12 **JEREMY DANIEL GRIFFIN**
5850 Hollywood Blvd.
13 Hollywood, CA 90038

ACCUSATION

14 Vocational Nurse License No. VN 230105

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in
20 her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric
21 Technicians, Department of Consumer Affairs (Board).

22 2. On or about October 11, 2007 the Board issued Vocational Nurse License No. VN
23 230105 to Jeremy Daniel Griffin (Respondent). The Vocational Nurse License was in full force
24 and effect at all times relevant to the charges brought herein. The Vocational Nurse License will
25 expire on August 31, 2011, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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1 ethical and behavioral standards of professional practice.

2 **COST RECOVERY**

3 10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
4 administrative law judge to direct a licensee found to have committed a violation or violations of
5 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
6 enforcement of the case.

7 **FIRST CAUSE FOR DISCIPLINE**

8 (Conviction of Substantially Related Crimes)

9 11. Respondent is subject to disciplinary action under sections 490 and 2878, subdivision
10 (f), in conjunction with California Code of regulations, title 16, section 2521, in that Respondent
11 was convicted of a crime substantially related to the qualifications, functions, or duties of a
12 licensed vocational nurse which to a substantial degree evidences his present or potential
13 unfitness to perform the functions authorized by his license in a manner consistent with the public
14 health, safety, or welfare. The circumstances are as follows:

15 a. On or about July, 16 2010, after pleading guilty, Respondent was convicted of one
16 misdemeanor count of violating Penal Code section 496d(a) [receiving stolen property, motor
17 vehicle] in the criminal proceeding entitled *The People of the State of California v. Jeremy Daniel*
18 *Griffin* (Super. Ct. Ventura County, 2010, No. 2009033813MA). The Court sentenced
19 Respondent to 10 days in jail and placed Respondent on 36 months of probation. Furthermore, the
20 Court ordered Respondent restitution in the amount of \$520.00.

21 b. The circumstances underlying the conviction are that on or about September 15,
22 2009, Respondent rented a vehicle for one day from Blue Oval located in Midway City and kept
23 the car for one and a half months, after telling the rental agency and an Orange County Sheriff's
24 Detective that he had returned the car to another Blue Oval located in North Hollywood.

25 **SECOND CAUSE FOR DISCIPLINE**

26 (Failure to Adhere to Ethical Standards)

27 12. Respondent's application is subject to denial under section 2878,
28 subdivision (a), in conjunction with California Code of Regulations, title 16, section 2518.6,

1 subdivision (b) on the grounds of unprofessional conduct, in that, Respondent failed to adhere to
2 the ethical standards of the profession. Complaint refers to and by this reference incorporates the
3 allegations set forth above in paragraph 11, subparagraphs a and b, inclusive, as though set forth
4 fully.

5 THIRD CAUSE FOR DISCIPLINE

6 (Unprofessional Conduct)

7 13. Respondent's application is subject to denial under section 2878, subdivision (a), in
8 that Respondent committed acts of unprofessional conduct. Complaint refers to and by this
9 reference incorporates the allegations set forth above in paragraphs 11 and 12, inclusive, as
10 though set forth fully.

11 DISCIPLINARY CONSIDERATIONS

12 14. To determine the degree of discipline, Complainant alleges that on or about
13 September 18, 2007, the Board issued a notice of warning to Respondent.

14 a. The circumstances underlying the notice of warning are that on or about July 5, 2005,
15 after pleading nolo contendere, Respondent was convicted of one misdemeanor count of violating
16 Penal Code section 484(a) [theft of property] in the criminal proceeding entitled *The People of the*
17 *State of California v. Jeremy Daniel Griffin* (Super. Ct. Los Angeles County, 2005, No.
18 5CR10214). The Court sentenced Respondent to six (6) days in jail, and placed Respondent on 12
19 months of probation. Furthermore, the Court ordered Respondent to pay restitution in the amount
20 of \$100.00 and a fine of \$266.00.

21 b. The circumstances underlying the conviction are that on or about June 30, 2005,
22 Respondent stole \$54.48 worth of merchandise from a Wal-Mart department store located in Los
23 Angeles, CA. The record of the criminal proceeding is incorporated as though set forth fully.

24 PRAAYER

25 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
26 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians
27 issue a decision:

28 1. Revoking or suspending Vocational Nurse License Number VN 230105, issued to

1 Jeremy Daniel Griffin;

2 2. Ordering Jeremy Daniel Griffin to pay the Board the reasonable costs of the
3 investigation and enforcement of this case, pursuant to section 125.3; and

4 3 Taking such other and further action as deemed necessary and proper.

5 DATED: August 19, 2011


TERESA BELLO-JONES, J.D., M.S.N., R.N.

Executive Officer

Board of Vocational Nursing and Psychiatric Technicians

Department of Consumer Affairs

State of California

Complainant

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